

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

REBECCA FRANCESCATTI,)	
)	
)	
)	No. 1:11-cv-05270
Plaintiff,)	
)	Honorable Marvin E. Aspen
v.)	Magistrate Judge Jeffrey T. Gilbert
)	
STEFANI JOANNE GERMANOTTA)	
p/k/a LADY GAGA, INTERSCOPE RECORDS,)	
UNIVERSAL MUSIC GROUP, INC.,)	
DJ WHITE SHADOW, LLC, and)	
BRIAN JOSEPH GAYNOR,)	JURY TRIAL DEMANDED
)	
Defendants.)	

**DEFENDANT’S MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Paragraph 12 of the February 15, 2012 Agreed Protective Order (Dkt. 57), Defendant Stefani Joanne Germanotta hereby respectfully moves the Court for permission to file under seal: (1) Statement of Undisputed Facts in Support of Defendants’ Motion for Summary Judgment; and (2) Exhibits 4, 12, 13, 15, 16, 17, 19 (audio exhibit only), 22, 27 (audio exhibit only), 28 (audio exhibit only), and 32 thereto. Where possible, redacted public versions of these documents were filed on March 4, 2013, and unredacted copies will be delivered to counsel for all parties and to chambers.

These documents have been designated as, or cite and/or refer to, information that has been designated as either (a) “Confidential” on the grounds that the producing party and its counsel reasonably and in good faith believe to constitute confidential business records or information, trade secrets, proprietary information, or confidential personal information or (b)

“Highly Confidential – Attorneys Eyes Only” on the grounds that the producing party and its counsel reasonably and in good faith believe that the material (i) is competitively sensitive; (ii) is of a type that it has a compelling business interest in not being disclosed to competitors; and (iii) presents a significant possibility of causing harm if known by others. Thus, good cause exists to file the documents described above under seal in this action. Accordingly, Defendant respectfully requests that the Court permit these documents to be filed under seal.

Dated: March 4, 2013

/s/Catherine J. Spector

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system on this 4th day of March, 2013.

/s/ Catherine J. Spector

Catherine J. Spector